

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

**VICKY L. HORNER,
Plaintiff,**

v.

CASE NO. 1:08CV00026

**SOUTHWEST VIRGINIA REGIONAL
JAIL AUTHORITY (SWVRJA), et. al.
Defendants.**

AND

**PAMELA O. SIZEMORE,
Plaintiff,**

v.

CASE NO. 1:08CV00035

**SOUTHWEST VIRGINIA REGIONAL
JAIL AUTHORITY (SWVRJA), et. al.
Defendants.**

AND

**PEGGY L. SHAZIER,
Plaintiff,**

v.

CASE NO. 1:08CV00037

**SOUTHWEST VIRGINIA REGIONAL
JAIL AUTHORITY (SWVRJA), et. al.
Defendants.**

AND

**PATTY SUE HUFF,
Plaintiff,**

v.

CASE NO. 1:08CV00041

**SOUTHWEST VIRGINIA REGIONAL
JAIL AUTHORITY (SWVRJA), et. al.
Defendants.**

MOTION FOR CONSOLIDATION

COMES now the above-referenced plaintiffs, by counsel, pursuant to Rule 42 of the Federal Rules of Criminal Procedure and moves this Court to consolidate their actions for discovery, hearings and trial; and in support thereof states as follows:

1. The actions involve many common questions of fact.
2. All four actions involve some common questions of law.
3. The parties subject to discovery, and witnesses subject to be deposed overlap to a large degree.
4. Consolidation would avoid unnecessary duplication of effort, cost, delay, and economize the resources of the Court.
5. No defendant would be prejudiced by consolidation.

WHEREFORE, the plaintiffs, and each of them, by counsel, respectfully moves this Court to order their actions be consolidated as to all issues and proceedings.

s/ Jay H. Steele

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CERTIFICATE OF SERVICE

I, Jay H. Steele, Counsel for Plaintiff, Vicky L. Horner, do hereby certify that I electronically filed the Plaintiffs Memorandum of Law in Support of Plaintiff's Response in Opposition of Defendants Motion to Dismiss with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Jim H. Guynn, Jr., Esq. and Susan A. Waddell, Esq. at Guynn, Memmer & Dillon, 415 S. College Avenue, Salem, VA 24153.

/s/ Jay H. Steele
Counsel for Defendant